

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. **You may use “not applicable” or “does not apply” only when you can explain why it does not apply and not when the answer is unknown.** You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to **all parts of your proposal**, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for lead agencies

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B, plus the [Supplemental Sheet for Nonproject Actions \(Part D\)](#). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in “Part B: Environmental Elements” that do not contribute meaningfully to the analysis of the proposal.

A. Background [Find help answering background questions](#)

1. Name of proposed project, if applicable:

City of Walla Walla SEPA Code Update – raising the flexible thresholds for minor new construction

2. Name of applicant:

City of Walla Walla

3. Address and phone number of applicant and contact person:

Preston Frederickson, Development Services Director

(509) 524-4735

4. Date checklist prepared:

Draft Checklist Prepared 1/26/2023

5. Agency requesting checklist:

WA Dept of Ecology, WA Dept of Commerce

6. Proposed timing or schedule (including phasing, if applicable):

Planning Commission briefing 2/6/23

Planning Commission hearing 4/6/23

City Council study session 5/8/23

City Council to vote on adopting code before 6/30/23

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

No future activity planned connected with this proposed code change.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

Technical memorandum on adequacy of city code protecting environmental and cultural resources, prepared for this code update process by LDC, Inc.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

No known applications pending directly related to this proposed code change.

10. List any government approvals or permits that will be needed for your proposal, if known.

Public hearing

60-day SEPA comment period

City Council action to adopt code change.

11. Give a brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

Walla Walla is proposing to amend WVMC 21.08 – State Environmental Policy Act (SEPA). Specifically, the City aims to increase the flexible thresholds for minor new construction as allowed under WAC 197-11-800(1). This is a nonproject proposal that would affect every project submitted for review to determine whether it is categorically exempt from SEPA review. The proposed code changes would raise the exemption for single-family residential units to 30 from 4; to 60 from 4 for multifamily units; to 30,000 square feet from 4,000 square feet for office, school, commercial, recreational, service, and storage buildings; to 90 parking spaces from 20; and to 1,000 cubic yards from 100 cubic yards of fill or excavation. The exemption level of 10,000 square feet of barn, loafing shed, farm equipment storage, produce storage, or packing structure is proposed to stay at this level.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

This proposed code change would affect the entire city of Walla Walla.

B. Environmental Elements

1. Earth [Find help answering earth questions](#)

a. General description of the site:

The proposal's affected geographic area is the entire city of Walla Walla, which has a wide range of

topographical features.

Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other:

N/A; entire city of Walla Walla.

b. What is the steepest slope on the site (approximate percent slope)?

N/A; entire city of Walla Walla.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them, and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

A wide range of soils can be found throughout the city. The Walla Walla area is characterized by Yakima sandy loam, Yakima fine sandy loam, Walla Walla silt loam, Yakima gravelly loam, and Yakima loam. Walla Walla has a small area of land in the northern area of the urban growth area (not within current city limits) that is designated as agricultural land of long-term commercial significance. This proposal would not affect any of this soil.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

Walla Walla has areas that are considered landslide hazard areas, seismic hazard areas, erosion hazard areas, and areas susceptible to other geologic events, including mass wasting, debris flows, rock falls, and differential settlement. Unstable soils are regulated in Chapter 21.04 of the Walla Walla Municipal Code.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

This is a nonproject proposal. The proposal does include raising the exemption level for fill or excavation from 100 cubic yards to 1,000 cubic yards for a given project seeking approval from the city.

f. Could erosion occur because of clearing, construction, or use? If so, generally describe.

Nothing in this nonproject proposal would directly lead to erosion risk. Regulations in Chapter 21.04, particularly in 21.04.550 and 21.04.560, prevent erosion from occurring because of clearing, construction, or use in any project seeking city approval.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

N/A – nonproject proposal, no construction activities proposed.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any.

N/A – nonproject proposal, no earth impacts anticipated. Regulations are in place in Walla Walla’s critical areas code to avoid or mitigate earth hazards.

2. Air [Find help answering air questions](#)

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

N/A – proposal is a nonproject proposal and would not result in emissions to the air.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

N/A – proposal is a nonproject action.

c. Proposed measures to reduce or control emissions or other impacts to air, if any.

N/A – proposal is a nonproject action.

3. Water [Find help answering water questions](#)

a. Surface Water: [Find help answering surface water questions](#)

1. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

Walla Walla has several surface water bodies, including year-round and seasonal streams like Mill Creek, Yellowhawk Creek, and Garrison Creek.

2. Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

N/A – proposal is a nonproject action.

3. Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

N/A – proposal is a nonproject action.

4. Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.

No, the proposal is a nonproject action.

5. Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

N/A – proposal is a nonproject action. However, there is a portion of the City of Walla Walla that lies within the 100-year floodplain for Russell and Reser Creeks. These two creeks eventually flow into Yellowhawk Creek, which eventually flows into the Walla Walla River. The City of Walla Walla has floodplain regulations that cover development in the floodplain in Chapter 21.10 WWMC.

6. Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No, the proposal is a nonproject action.

b. Ground Water: [Find help answering ground water questions](#)

1. Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give a general description, purpose, and approximate quantities if known.

No, the proposal is a nonproject action.

2. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

N/A – proposal is a nonproject action.

c. Water Runoff (including stormwater):

1. Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

This is a nonproject action. However, new development projects have to comply with the City of Walla Walla Stormwater Design Handbook and the Department of Ecology's Eastern Washington stormwater manual.

2. Could waste materials enter ground or surface waters? If so, generally describe.

No. The proposal is a nonproject action.

3. Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so,

describe.

No. Any projects, regardless of whether they are exempt from SEPA, have to handle their own stormwater impacts on the project site.

4. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any.

Any project that was categorically exempt from SEPA under the proposed code changes would still be subject to the City of Walla Walla's stormwater code and the Ecology Eastern Washington Stormwater Manual.

4. Plants [Find help answering plants questions](#)

a. Check the types of vegetation found on the site:

- ☒ deciduous tree: alder, maple, aspen, other
- ☒ evergreen tree: fir, cedar, pine, other
- ☒ shrubs
- ☒ grass
- ☒ pasture
- ☒ crop or grain
- ☒ orchards, vineyards, or other permanent crops.
- ☒ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- ☐ water plants: water lily, eelgrass, milfoil, other
- ☐ other types of vegetation

b. What kind and amount of vegetation will be removed or altered?

N/A – proposal is a nonproject action.

c. List threatened and endangered species known to be on or near the site.

N/A – proposal is a nonproject action.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.

N/A – proposal is a nonproject action.

e. List all noxious weeds and invasive species known to be on or near the site.

Noxious weeds that can be found in the Walla Walla area include toadflax, hawkweeds, knapweed, knotweed, and spurge.

5. Animals [Find help answering animal questions](#)

- a. List any birds and other animals that have been observed on or near the site or are known to be on or near the site.

Examples include:

- Birds: hawk, heron, eagle, songbirds, other:
- Mammals: deer, bear, elk, beaver, other:
- Fish: bass, salmon, trout, herring, shellfish, other: Lamprey, freshwater mussels

- b. List any threatened and endangered species known to be on or near the site.

Known to be bull trout and summer steelhead near Walla Walla.

- c. Is the site part of a migration route? If so, explain.

The entire city is in the Pacific Flyway.

- d. Proposed measures to preserve or enhance wildlife, if any.

N/A – proposal is a nonproject action.

- e. List any invasive animal species known to be on or near the site.

None to our knowledge – proposal is a nonproject action.

6. Energy and Natural Resources [Find help answering energy and natural resource questions](#)

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

None – proposal is a nonproject action.

- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

None – proposal is a nonproject action.

- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.

None – proposal is a nonproject action.

7. Environmental Health [Find help with answering environmental health questions](#)

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal? If so, describe.

1. Describe any known or possible contamination at the site from present or past uses.

Not applicable, this is a nonproject action. However, some sites in Walla Walla do have potential contamination from past uses, like former gas station sites or former industrial uses.

a. Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

Natural gas pipelines run through Walla Walla. All ground-disturbing projects are required to call before digging to ensure no impact. That would not change as a result of this proposed nonproject action.

b. Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

None. This is a nonproject action.

c. Describe special emergency services that might be required.

None. This is a nonproject action.

d. Proposed measures to reduce or control environmental health hazards, if any.

None required or proposed. This is a nonproject action.

b. Noise

1. What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

There is general traffic noise throughout the city as well as some aircraft from flights to and from the Walla Walla Regional Airport.

2. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?

A project that is exempt from SEPA review as a result of the proposed code change may generate construction noise in the short term and traffic noise in the long term.

3. Proposed measures to reduce or control noise impacts, if any.

All projects seeking approval from the city are regulated by WVMC 8.13, maximum permissible sound levels.

8. Land and Shoreline Use [Find help answering land and shoreline use questions](#)

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

Land within the city of Walla Walla includes residential, commercial, industrial, institutional, and parks and open space uses. This proposal nonproject action would apply new minor new construction exemptions from SEPA citywide as long as a project does not exceed these thresholds and is not otherwise pre-empted from exemption (action proposed on lands covered by water or a non-exempt land use action, for example).

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

The Walla Walla Valley has been used for agricultural purposes in the past. Walla Walla has a small area of land within the northern portion of its urban growth area (not within current city limits) designated agricultural land of long-term commercial significance. Nothing in this nonproject action would have any effect on this land.

1. Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?

N/A – this is a nonproject action.

c. Describe any structures on the site.

N/A – this is a nonproject action.

d. Will any structures be demolished? If so, what?

N/A – this is a nonproject action.

e. What is the current zoning classification of the site?

Within Walla Walla, there are 10 zoning designations: Neighborhood Residential, Multi-Family Residential, Central Commercial, Highway Commercial, Light Industrial/Commercial, Heavy Industrial, Public Reserve, Airport Development, Airport Approach Overlay, and Urban Planned Communities.

f. What is the current comprehensive plan designation of the site?

The land use designations identified in the comprehensive plan are Airport, Commercial, Industrial, Residential, Multifamily, Master Plan Community, and Public.

g. If applicable, what is the current shoreline master program designation of the site?

N/A – this is a nonproject action. Walla Walla has an identified shoreline of the state along Mill Creek.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

Critical areas exist throughout the city and are regulated by Chapter 21.04 WVMC.

i. Approximately how many people would reside or work in the completed project?

N/A – this is a nonproject action.

j. Approximately how many people would the completed project displace?

None. This is a nonproject action.

k. Proposed measures to avoid or reduce displacement impacts, if any.

N/A – this is a nonproject action.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.

N/A – this is a nonproject action. Walla Walla's development code contains numerous provisions designed to ensure compatibility between neighboring land uses.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any.

N/A – this is a nonproject action.

9. Housing [Find help answering housing questions](#)

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

N/A – this is a nonproject action.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

None – this is a nonproject action.

c. Proposed measures to reduce or control housing impacts, if any.

None – this is a nonproject action. Raising the thresholds for minor new construction can help reduce permitting requirements for badly needed housing of various types whose minor impacts are already mitigated through the city's development regulations.

10. Aesthetics [Find help answering aesthetics questions](#)

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

N/A – this is a nonproject action.

b. What views in the immediate vicinity would be altered or obstructed?

N/A – this is a nonproject action.

c. Proposed measures to reduce or control aesthetic impacts, if any.

N/A – this is a nonproject action.

11. Light and Glare [Find help answering light and glare questions](#)

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

None. This is a nonproject action.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

N/A – this is a nonproject action.

c. What existing off-site sources of light or glare may affect your proposal?

N/A – this is a nonproject action.

d. Proposed measures to reduce or control light and glare impacts, if any.

N/A – this is a nonproject action.

12. Recreation [Find help answering recreation questions](#)

a. What designated and informal recreational opportunities are in the immediate vicinity?

N/A – this is a nonproject action. Numerous recreation opportunities can be found throughout the city of Walla Walla.

b. Would the proposed project displace any existing recreational uses? If so, describe.

N/A – this is a nonproject action.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities

to be provided by the project or applicant, if any.

N/A – this is a nonproject action.

13. Historic and Cultural Preservation [Find help answering historic and cultural preservation questions](#)

- a. **Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.**

N/A – this is a nonproject action. However, the City of Walla Walla has a local register of historic places. Modifications to a structure on the local register requires prior approval by the Historic Preservation Commission.

- b. **Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.**

N/A – this is a nonproject action. However, Walla Walla has several tribal nations with histories in and around Walla Walla, including the Nez Perce, the Confederated Tribes of Umatilla Reservation – Cayuse, Umatilla, and Walla Walla, and the Yakama Nation.

- c. **Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.**

Not applicable. The RHAP is a non-project action. However, SEPA determinations and environmental checklists are provided to agencies with jurisdiction for review and comments. Staff also utilizes DAHP's WISSARD to research any potential cultural/historic resources within the vicinity of a project.

- d. **Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.**

As part of this code update, the City of Walla Walla is ensuring that all projects, including SEPA exempt projects, better protect cultural resources by codifying requirements of who receives notice about projects in the city's general permit administration code as well as codifying inadvertent discovery language for all permits for construction or clearing and grading.

14. Transportation [Find help with answering transportation questions](#)

- a. **Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.**

Public streets within the city range from arterials to local residential streets. There are two state highways, SR 125 and Highway 12, that run through the city limits of Walla Walla.

- b. **Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?**

Not applicable. This is a non-project action. However, Valley Transit provides service throughout Walla Walla and surrounding areas.

- c. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

N/A – this is a nonproject action.

- d. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

N/A – this is a nonproject action.

- e. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

None – this is a nonproject action.

- f. Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

No. This is a nonproject action.

- g. Proposed measures to reduce or control transportation impacts, if any.

N/A – this is a nonproject action.

15. Public Services [Find help answering public service questions](#)

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

N/A – this is a nonproject action.

- b. Proposed measures to reduce or control direct impacts on public services, if any.

N/A – this is a nonproject action.

16. Utilities [Find help answering utilities questions](#)

- a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:

- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

N/A – this is a nonproject action.

C. Signature [Find help about who should sign](#)

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Type name of signee: Jon Maland

Position and agency/organization: Senior Planner

Date submitted: 2/1/2023

D. Supplemental sheet for nonproject actions [Find help for the nonproject actions worksheet](#)

IT IS NOT REQUIRED to use this section for project actions.

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

The proposal, which is to increase the minor new construction categorical exemptions from SEPA review in accordance with the flexible thresholds allowed under the Department of Ecology's administrative code, would not directly increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise. Projects that would newly be exempted from SEPA review under the proposed code changes would have these impacts prevented or mitigated by existing code and regulations. Additionally, the minor new construction thresholds do not apply when a project is undertaken wholly or partly on lands covered by water, requires a license governing discharges to water that is not exempt under RCW [43.21C.0383](#), requires a license governing emissions to air that is not exempt under RCW [43.21C.0381](#) or WAC 197-11-800(7) or (8), or requires a land use decision that is not exempt under WAC 197-11-800(6).

- **Proposed measures to avoid or reduce such increases are:**

City critical areas and other codes are in place to avoid or reduce such increases, as documented in the technical memorandum prepared as part of this proposed nonproject action. Additionally, the City of Walla Walla studied the cumulative impact of additional development in the FEIS issued May 22, 2018 for its comprehensive plan update.

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

There are no anticipated impacts to plants, animals, fish, or marine life. City critical areas code in Chapter 21.04 WMMC adequately protect fish and wildlife habitat areas as well as wetlands, trees, and other critical areas and their buffers.

- **Proposed measures to protect or conserve plants, animals, fish, or marine life are:**

If new construction is proposed that would involve critical areas then compliance with the jurisdictions' Critical Areas Ordinance and landscaping standards if development proposed.

3. How would the proposal be likely to deplete energy or natural resources?

The proposal is not likely to deplete energy or natural resources.

- **Proposed measures to protect or conserve energy and natural resources are:**

Construction and remodel projects are required to meet the state energy code. Regarding natural resources, the City looks a tree removal as it reviews development projects for compliance with the landscaping regulations; is groundwater being impacted by the project; what level of ground disturbance is proposed by a project, etc.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

Adoption of the proposed code changes not affect environmentally sensitive areas, which are governed by the city's critical areas code, or impact areas such as parks, which are managed by the city. If new construction is proposed and sensitive areas involved in the proposal, then the project would also be required to comply with the city's Critical Areas Ordinance, which adequately protects sensitive areas as documented in the technical memorandum.

- **Proposed measures to protect such resources or to avoid or reduce impacts are:**

In addition to existing code, which adequately protects, parks, rivers, threatened or endangered species habitat, wetlands, floodplains, and prime farmlands, the technical memorandum proposes (and draft code includes) changes to code regarding who receives notices of projects and inadvertent discovery language for all permits for construction or clearing and grading in the city. This will help better protect cultural resources and ensure that interested parties are notified even when projects are exempt from SEPA review.

5. How would the proposal be likely to affect land and shoreline use, including whether it

would allow or encourage land or shoreline uses incompatible with existing plans?

It is not anticipated that the proposed code change would affect land and shoreline use, as the city's zoning code, comprehensive plan, and shoreline master program already address land use compatibility, and any proposed project, whether SEPA exempt or not, must be consistent with the city's code and plans.

- **Proposed measures to avoid or reduce shoreline and land use impacts are:**

The city's land use code and shoreline master program adequately address impacts to shorelines and adjacent land uses.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

If new development is proposed that is newly exempt from SEPA review as part of this proposal, this new development will invariably increase demands on transportation or public services and utilities. However, the city's comprehensive plan has already studied the cumulative impacts of development in the 20-year planning horizon on transportation and public services and utilities.

- **Proposed measures to reduce or respond to such demand(s) are:**

City code is in place to respond to transportation impacts through concurrency and utility system development charges.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

Not aware of the proposed conflicting with local, state, or federal laws.